

**BURSOR & FISHER, P.A.**  
Neal Deckant (State Bar No. 320783)  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: ndeckant@bursor.com

**GIBSON, DUNN & CRUTCHER LLP**  
Lauren R. Goldman (pro hac vice)  
lgoldman@gibsondunn.com  
Darcy C. Harris (pro hac vice)  
dharris@gibsondunn.com  
200 Park Avenue  
New York, NY 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035

*Attorneys for Plaintiffs*

*Attorneys for Defendant*

*Additional Attorneys on Signature Page*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

Master File No. 5:22-cv-07557-PCP

This document relates to:

**STIPULATION AND [PROPOSED]  
ORDER TO MODIFY CLASS  
CERTIFICATION BRIEFING  
DEADLINES**

All actions

**[L.R. 6-2]**

The parties jointly ask the Court for a four-week extension of the deadline for Plaintiffs' motion for class certification, from July 21, 2025 to August 18, 2025. The parties make this request because the deposition of Meta's 30(b)(6) witness had been scheduled for June 13, 2025, which would have occurred sufficiently in advance of the class certification deadline. However, on June 6, 2025, counsel for Meta represented that the prepared deponent was no longer available on June 13, 2025, due to a bereavement requiring travel out of the country for an indefinite period, and that Meta's most suitable alternative 30(b)(6) deponent was out of the country the week of June 9th, returning June 16, 2025. Counsel have met and conferred and have agreed to reschedule the 30(b)(6) deposition for July 14, 2025, the soonest available alternative date for Meta's alternative witness.

To avoid prejudice to Plaintiffs from the change in dates, the parties have agreed, subject to approval by the Court, to alter the class certification deadlines as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Plaintiffs' Motion for Class Certification	July 21, 2025	August 18, 2025
Meta's Opposition to Class Certification	September 29, 2025	October 27, 2025
Plaintiffs' Reply Brief	November 17, 2025	December 15, 2025

There was one prior request to alter the class certification, which the Court granted. *See* ECF No. 156. There is compelling good cause for this request because, as Meta represents, it is the result of unforeseen, extenuating circumstances, which arose through no fault of either party, and the parties have promptly sought relief from the Court. In addition, the requested extension is brief, and corresponds to the amount of time lost due to the deposition scheduling issue (i.e., approximately four weeks).

The Court has not set any deadlines other than for class certification briefing, and so granting this request will have no other effect on the schedule for the case. Accordingly, the parties jointly ask the Court to modify the current deadlines according to the new dates set forth above.

1 Dated: June 20, 2025

**SMITH KRIVOSHEY, P.C.**

2 By: /s/ Joel Smith

3 Joel D. Smith (State Bar No. 244902)  
4 867 Boylston Street, 5<sup>th</sup> Floor  
5 Boston, MA 02216  
6 Telephone: 617-377-7404  
7 Email: joel@skclassactions.com

**BURSOR & FISHER, P.A.**

8 Neal Deckant (State Bar No. 320783)  
9 1990 North California Blvd., Suite 940  
10 Walnut Creek, CA 94596  
11 Telephone: (925) 300-4455  
12 Facsimile: (925) 407-2700  
13 E-mail: jsmith@bursor.com

**GEORGE FELDMAN MCDONALD, PLLC**

14 Lori G. Feldman (*pro hac vice*)  
15 Michael Liskow (State Bar No. 243899)  
16 102 Half Moon Bay Drive  
17 Croton-on-Hudson, NY 10520  
18 Telephone: (917) 983-9321  
19 E-mail: lfeldman@4-justice.com  
20 mliskow@4-justice.com  
21 eservice@4-justice.com

**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

22 Rebecca A. Peterson (241858)  
23 Kate M. Baxter-Kauf (*pro hac vice*)  
24 100 Washington Avenue South, Suite 2200  
25 Minneapolis, MN 55401  
26 Telephone: (612) 339-6900  
27 Facsimile: (612) 339-0981  
28 rkshelquist@locklaw.com  
E-mail: rapeterson@locklaw.com  
kmbaxter-kauf@locklaw.com

**THE HODA LAW FIRM, PLLC**

Marshal J. Hoda, Esq. (*pro hac vice*)  
12333 Sowden Road, Suite B  
Houston, TX 77080  
Telephone: (832) 848-0036  
Email: marshal@thehodalawfirm.com

**FOSTER YARBOROUGH PLLC**

Patrick Yarborough, Esq. (*pro hac vice*)  
917 Franklin Street, Suite 220  
Houston, TX 77002

Telephone: (713) 331-5254  
Email: patrick@fosteryarborough.com

**EMERSON FIRM, PLLC**

John G. Emerson (pro hac vice)

2500 Wilcrest, Suite 300

Houston, TX 77042

Telephone: (800) 551-8649

Email: jemerson@emersonfirm.com

*Attorneys for Plaintiffs*

Dated: June 20, 2025

**GIBSON, DUNN & CRUTCHER LLP**

By: /s/ Lauren R. Goldman

Lauren R. Goldman

LAUREN R. GOLDMAN (pro hac vice)

lgoldman@gibsondunn.com

DARCY C. HARRIS (pro hac vice)

dharris@gibsondunn.com

200 Park Avenue New York, NY 10166-0193

Telephone: (212) 351-4000

Facsimile: (212) 351-4035

ELIZABETH K. MCCLOSKEY, SBN 268184

emccloskey@gibsondunn.com

ABIGAIL A. BARRERA, SBN 301746

abarrera@gibsondunn.com

One Embarcadero Center, Suite 2600 San Francisco,  
CA 94111-3715

Telephone: (415) 393-8200

Facsimile: (415) 393-8306

**COOLEY LLP**

MICHAEL G. RHODES, SBN 116127

rhodesmg@cooley.com

KYLE C. WONG, SBN 224021

kwong@cooley.com

CAROLINE A. LEBEL, SBN 340067

clebel@cooley.com

3 Embarcadero Center, 20th Floor San Francisco, CA  
94111-4004

Telephone: (415) 693-2000

Facsimile: (415) 693-2222

**CIVIL L.R. 5-1(i)(3) ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: June 20, 2025

By: /s/ Joel Smith

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. P. Casey Pitts  
U.S. District Judge